

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

-----X	:	No. 3:14-cv-00682-JRS
	:	
IN RE GENWORTH FINANCIAL INC.	:	Hon. James R. Spencer
SECURITIES LITIGATION	:	
	:	
	:	
-----X	:	

**LEAD PLAINTIFFS' REQUEST FOR LEAVE TO FILE  
NOTICE OF RECENT AUTHORITY IN FURTHER SUPPORT OF  
THEIR OPPOSITION TO DEFENDANTS' MOTION TO DISMISS**

**LAW OFFICES OF  
SUSAN R. PODOLSKY**  
1800 Diagonal Road, Suite 600  
Alexandria, Virginia 22314  
Telephone: (571) 366-1702  
Facsimile: (703) 647-6009

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**  
12481 High Bluff Drive, Suite 300  
San Diego, California 92130  
Telephone: (858) 793-0070  
Facsimile: (858) 793-0323

**BLEICHMAR FONTI  
TOUNTAS & AULD LLP**  
7 Times Square, 27th Floor  
New York, New York 10036  
Telephone: (212) 789-1340  
Facsimile: (212) 205-3960

*Counsel for Lead Plaintiffs and the Class*

Lead Plaintiffs, Her Majesty the Queen in Right of Alberta and Fresno County Employees' Retirement Association, respectfully request pursuant to Local Civ. R. 7(F)(1) that the Court grant them leave to file the attached document, Lead Plaintiffs' Notice Of Recent Authority In Further Support Of Their Opposition To Defendants' Motion To Dismiss ("Notice").

The Fourth Circuit's decision this week in *Zak v. Chelsea Therapeutics Int'l, Ltd.*, No. 13-2370, 2015 WL 1137142 (4th Cir. Mar. 16, 2015), is relevant to Defendants' motion to dismiss for the reasons discussed in the Notice. Lead Plaintiffs were unable to submit this decision with their Opposition brief because the decision was not issued until after the March 9, 2015 deadline for Lead Plaintiffs to file their Opposition.

Counsel for Lead Plaintiffs telephonically notified defense counsel of Lead Plaintiffs' intention to submit this recent authority for the Court's consideration. Defendants' reply brief in support of their motion to dismiss is due March 24, 2015, and the hearing regarding the motion is scheduled for April 28, 2015.

DATED: March 18, 2015

By: /s/ Susan R. Podolsky  
Susan R. Podolsky (Va. Bar No. 27891)  
**LAW OFFICES OF SUSAN R. PODOLSKY**  
1800 Diagonal Road, Suite 600  
Alexandria, Virginia 22314  
Telephone: (571) 366-1702  
Facsimile: (703) 647-6009  
spodolsky@podolskylaw.com

*Local Counsel for Lead Plaintiffs Her Majesty  
the Queen in Right of Alberta and Fresno  
County Employees' Retirement Association*

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

David R. Stickney (admitted *pro hac vice*)  
Jonathan D. Uslaner (admitted *pro hac vice*)  
Brandon Marsh (admitted *pro hac vice*)  
12481 High Bluff Drive, Suite 300  
San Diego, California 92130  
Telephone: (858) 793-0070  
Facsimile: (858) 793-0323  
davids@blbglaw.com  
jonathanu@blbglaw.com  
brandon.marsh@blbglaw.com

-and-

Gerald H. Silk (admitted *pro hac vice*)  
Avi Josefson (admitted *pro hac vice*)  
1285 Avenue of the Americas  
New York, New York 10019  
Telephone: (212) 554-1400  
Facsimile: (212) 554-1444  
jerry@blbglaw.com  
avi@blbglaw.com

*Counsel for Lead Plaintiff Fresno County  
Employees' Retirement Association and  
Co-Lead Counsel for the Class*

**BLEICHMAR FONTI  
TOUNTAS & AULD LLP**

Dominic J. Auld (admitted *pro hac vice*)  
Joseph A. Fonti (admitted *pro hac vice*)  
Stephen W. Tountas (admitted *pro hac vice*)  
Cynthia Hanawalt (admitted *pro hac vice*)  
Jeffrey R. Alexander (admitted *pro hac vice*)  
7 Times Square, 27th Floor  
New York, New York 10036  
Telephone: (212) 789-1340  
Facsimile: (212) 205-3960  
dauld@bftalaw.com  
jfonti@bftalaw.com  
stountas@bftalaw.com  
chanawalt@bftalaw.com  
jalexander@bftalaw.com

*Counsel for Lead Plaintiff Her Majesty the  
Queen in Right of Alberta and Co-Lead  
Counsel for the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 18, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

DATED: March 18, 2015

/s/ Susan R. Podolsky  
Susan R. Podolsky (Va. Bar No. 27891)